

Anna W. Drake, No. A0909
ANNA W. DRAKE, P.C.
PO Box 581126
Salt Lake City, UT 84158-1126
Telephone: 385.258.7025
Facsimile: 801.363.3614
Email: annadrake@att.net

Attorney for Debtor and Debtor-in-Possession

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

In re:

ALL RESORT GROUP, INC.,
dba All Resort Coach, Inc.; *dba* ARG
Vehicle Service Center, LLC, *dba* LV
Service Center; *dba* Park City
Transportation, Inc.; *dba* Premier
Transportation, Inc.; *dba* Resort Express,
Inc.; *dba* All Resort Limousine; *dba* All
Resort Transportation; *dba* Lewis Stages; *dba*
Lewis Tours; *dba* Park City Reservations;
dba Park City Shuttles; *dba* Park City
Transportation Ski Express Shuttle; *dba*
Redhorse Express; *dba* Salt Lake Airport
Shuttle; *dba* Salt Lake City Airport Shuttle;
dba SuperShuttle of Utah;
dba Utah Airport Transportation; *dba* Xpress
4 Less Taxi; *dba* Xpress 4 Less; *et al.*;

Debtor.

Bankruptcy No. 17-23687 RKM

Chapter 11

Chief Judge R. Kimball Mosier

**DEBTOR'S OBJECTION TO MOTION OF HINCKLEY'S INC. FOR RELIEF FROM
THE AUTOMATIC STAY AND/OR ADEQUATE PROTECTION AND ALLOWANCE
AND PAYMENT OF ADMINISTRATIVE EXPENSE
[Docket No. 258]**

All Resort Group, Inc., the above-named Debtor and Debtor-in-Possession ("**Debtor**"),
hereby objects to the *Motion of Hinckley's Inc. for Relief from the Automatic Stay and/or*

Adequate Protection and Allowance and Payment of Administrative Expense (“**Motion**”) filed by Hinckley’s Inc. (“**Movant**”), and in support thereof, respectfully represents as follows:

1. Debtor admits the truth of the allegations contained in paragraphs 1 through 7 of the Motion.

2. Debtor denies the truth of the allegations contained in paragraph 8.

3. Responding to paragraph 9, the Debtor admits that it made one payment to Movant in the amount stated but denies all other allegations therein.

4. Debtor denies the truth of the allegations in paragraph 10.

5. In response to paragraph 11, Debtor admits that it has not made any other payments to Movant and denies all other allegations contained therein due to lack of knowledge and belief.

6. Debtor denies the allegations in paragraphs 12 through 15.

7. Responding to paragraph 16, Debtor admits that it has made several payments to administrative creditors.

8. Debtor denies the allegations in paragraph 17.

9. WHEREFORE, Debtor submits that Movant is not entitled to relief from the automatic stay since the Debtor is prepared to provide adequate protection of the Movant’s interest in the vehicles through the monthly payments beginning September 26, 2017, and continuing monthly thereafter on the first day of each month. The vehicles are necessary for an effective reorganization that is in prospect. Any required adequate protection payments should not be required on a retroactive basis. Based upon the foregoing, Debtor prays that the Motion be denied and that it have such other and further relief as is just (*including setting the final*

hearing on this Motion for a date after September 26, 2017).

DATED this 9th day of September, 2017.

/s/ Anna W. Drake

Anna W. Drake, No. A0909

ANNA W. DRAKE, P.C.

PO Box 581126

Salt Lake City, UT 84158-1126

Attorney for Debtor and Debtor-in-Possession

CERTIFICATE OF SERVICE - BY NOTICE OF ELECTRONIC FILING (CM/ECF)

I hereby certify that on September 9, 2017, I electronically filed the foregoing Objection with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users and will be served through the CM/ECF system:

- Brett N. Anderson bretta@blackburn-stoll.com
- Troy J. Aramburu taramburu@swlaw.com,
nharward@swlaw.com;docket_slc@swlaw.com
- Megan K Baker baker.megan@dorsey.com, long.candy@dorsey.com
- Deborah Rae Chandler dchandler@joneswaldo.com
- Joseph M.R. Covey calendar@parrbrown.com
- T. Edward Cundick tec@princeyeates.com,
docket@princeyeates.com;pam@princeyeates.com
- Anna W. Drake annadrake@att.net, r51122@notify.bestcase.com
- Mary Margaret Hunt hunt.peggy@dorsey.com, long.candy@dorsey.com
- Annette W. Jarvis jarvis.annette@dorsey.com, long.candy@dorsey.com
- Bradley C. Johnson bcjohnson@slco.org, PPodwys@slco.org
- Peter J. Kuhn tr Peter.J.Kuhn@usdoj.gov,
James.Gee@usdoj.gov;Lindsey.Huston@usdoj.gov;Suzanne.Verhaal@usdoj.gov
- Adelaide Maudsley amaudsley@kmclaw.com, tslaughter@kmclaw.com
- Steven J. McCardell smccardell@djplaw.com, khughes@djplaw.com
- Mark S. Middlemas LundbergECFmail@Lundbergfirm.com,
ecfmaildistgroup@lundbergfirm.com
- Sherilyn A. Olsen solsen@hollandhart.com,
slclitdocket@hollandhart.com;intaketeam@hollandhart.com;cfries@hollandhart.com
- Ellen E Ostrow eeostrow@hollandhart.com,
mkthurgood@hollandhart.com;intaketeam@hollandhart.com
- George W. Pratt gpratt@joneswaldo.com
- Jeffrey Weston Shields jshields@joneswaldo.com,
5962725420@filings.docketbird.com; ymahoney@joneswaldo.com
- Jeff D. Tuttle jtuttle@swlaw.com, jpollard@swlaw.com;docket_slc@swlaw.com
- United States Trustee USTPRegion19.SK.ECF@usdoj.gov

/s/ Anna W. Drake_____